

July 17, 2002

Honorable Magalle Roman Salas, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-B204
Washington, DC 20554

Dear Secretary Salas:

RE: Docket #01-108

Please consider this letter an ex parte document. This letter is in response to lobbying of the FCC by AT&T Wireless to obtain relief from Part 22 of the FCC rules requiring cellular radiotelephone service providers to provide analog cellular service. Glenn County Transportation Commission respectfully requests that the FCC not grant relief to AT&T Wireless and/or other cellular radiotelephone service providers from the aforementioned requirement.

The Glenn County Transportation Commission has recently established the Service Authority for Freeway Emergencies within the County. The call box system took several years to implement due to the low number of registered vehicles in the County. The annual revenue is approximately \$20,000.

The system is operated by Capital Valley SAFE. There are currently 14 call boxes in Glenn County with 10 boxes located on Interstate 5. These boxes are the northernmost on Interstate 5. The system provides a lifeline for motorists to report incidents and request assistance because cellular service is not reliable in this area. As a local agency with limited financial capacity and resources, the Glenn County Transportation Commission has to diligently manage its public funds. Any relief provided by the FCC regarding the continued provision of analog cellular service will have a direct and immediate negative impact on the ability of Glenn County to maintain a reliable call box system and thereby endanger the motorists of California.

The estimates to modify the call box system to operate using digital technology is approximately \$800 per call box or approximately \$12,000, almost the entire revenue for one year. In addition, there is concern about the impact of digital technology on the TTY capabilities of the call box.

The Commission is concerned about the current compatibility of digital wireless systems with TTYs, a concern also voiced by the FCC. The cost for this conversion is unknown.

The Glenn County Transportation Commission is not opposed to the desires of AT&T Wireless and the cellular industry to change from an analog to a digital based cellular system; it does oppose any rulings or relief that would benefit AT&T Wireless and/or other cellular radiotelephone service providers and would result in negative financial, safety and service impacts to the public. The Glenn County Transportation Commission would propose the FCC mandate that AT&T Wireless enter into a partnership with the SAFE Call Box Authorities in California to mitigate any financial, technological and other barriers the SAFE System would be faced with and develop a transition plan that will be beneficial to all parties.

We graciously request that this letter be considered by the FCC at the time that a decision is being rendered.

Sincerely yours,

Douglas Holvik
Executive Director

cc: The Honorable Diane Feinstein
The Honorable Barbara Boxer
The Honorable Doug Ose

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